This petition would create severe problems for the FCC if implimented as written. First off, unless there were some tag assigned or sub-class noted for each Passed code, or code opted out by individuals chaos could be the order of the day. Just recently a young person that passed element 1 was sited by the FCC for illegal operation in the Novice portion of the HF spectrum. This just because the Tech Plus classifacation was dropped, as now all Technician class halders are in the data base as Technician no matter if they are a straight Technician or a Technician Plus.

Reducing the test to 20 questions is back to the level a Novice was 35 years ago. This grade did require a 5 word send and receive CW test, and was only good for two years.

I do agree the Morse proficiency part should consist of both send and receive.

The proposed makeup of the question structure is far too generalized.

If a VE has the right to opt out for mode privliges because lack proficiency in that mode, this is going to mean a person in a certain area may have to make an unnecessary trip to another location if the person wants to be tested on a specific element, and no VE exist in their location.

This petition was not thought out with all possible negative implecations implied.